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ORIGINAL  
FILE

# Caption America

September 23, 1992

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Ms. Donna R. Searcy  
Secretary  
Room 222

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

MAIL BRANCH

*RM8066*

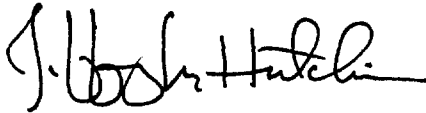
Dear Ms. Searcy:

Enclosed please find one original and nine copies of our comments in support of the Request for Amendment of the Commission's Rules to enable use of Line 21, Field 2, for closed captions and other data services.

We are forwarding under separate cover a courtesy copy of these comments to Mr. William H. Hassinger in the Mass Media Bureau at the Commission.

Thank you for your assistance.

Sincerely,



Jeffrey M. Hutchins

No. of Copies rec'd  
List A B C D E

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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OFFICE OF THE SECRETARY

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In the Matter of

Request for Amendment of the  
Commission's rules to Enable  
Use of Line 21, Field 2, for  
Closed Captions and Data Services

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RM-8066

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**COMMENTS OF CaptionAmerica  
IN SUPPORT OF REQUEST FOR AMENDMENT**

CaptionAmerica is pleased to comment on the above-captioned Petition for Rulemaking filed with the FCC by the Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG"). CaptionAmerica is a member of the Television Data Systems Subcommittee (TDSS) within EIA/CEG. We have had the opportunity to aid the TDSS in their preparation of this Petition.

CaptionAmerica fully supports the Petition. We believe that adoption of the EIA/CEG's proposal is an important next step in advancing the usefulness of captioning in the United States. The five major goals of captioning would all be enhanced by adoption of the proposal. These five goals are:

- providing access to video information for millions of people who are deaf and hard-of-hearing,
- increasing literacy among Americans of all ages and abilities,
- helping people learn English as a second language,

- **allowing viewers to follow a program even when they are in a noisy environment (such as an airport lobby) or a quiet environment (such as a hospital room), and**
- **improving comprehension of video materials among all viewers.**

**The current closed-captioning system, using only Field 1 of Line 21, in theory allows for two simultaneous, independent sets of captions on a single program. The staff of CaptionAmerica, which includes the author of most of the significant technical documents related to Line 21, has studied the feasibility of using both caption channels simultaneously. We have concluded unconditionally that dual-channel captioning poses such burdensome logistical problems as to be totally unworkable. The only practical means of providing viewers with a choice of more than one language or linguistic level of captions is to allow a second field to carry data.**

**We have learned over the years that consumers, particularly those who are deaf, crave such a choice. The issue of the linguistic level of captions is intimately related to the issue of access. Many people who are born deaf, or who become deaf at an early age, never acquire the same level of reading skill as their peers who are able to hear. In many cases, the primary language used by these people is American Sign Language; spoken and written English is tantamount to a foreign language to them. Therefore, they derive minimal benefit from captions which are**

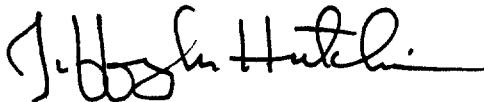
**a verbatim or near-verbatim representation of a program's soundtrack. Yet the majority of consumers who benefit from captioning, including millions of elderly viewers who have lost their hearing late in life, face no such problem with written English. They overwhelmingly prefer verbatim captioning.**

**Our dilemma is that we cannot now provide adequate access for both groups. If we caption verbatim as the majority wishes, deaf people with poor written-English skills are left out. If we caption at a level appropriate to the poorer reader, the vast majority of viewers is frustrated (and captioning will become nearly useless to hearing people learning to read or speak English). In fact, one college-educated man who is deaf told us he believes that edited captions deny him access to programs, because no matter how many times he might watch a program, he will never be able to know exactly what was said, a right hearing people enjoy.**

**Verbatim captioning would occupy so much of the Field 1 bandwidth at certain times, that it would be impossible to have any sort of edited caption in the opposite Field 1 data channel during those periods. Our studies show that the second channel would be sacrificed nearly 10% of the time. We also estimate that our costs for preparing dual channels would be about 50% higher than the costs of preparing two sets of captions for encoding on separate fields. This increase is the result of the effort required to interleave the data in a manner which allows each caption to appear, intact and on time, on all decoders. The higher cost means it is unlikely that dual-channel captioning will ever be used.**

**The EIA/CEG Petition addresses these issues properly and in a manner which will result in virtually no expense to consumers and the TV Industry. We recognize that Field 2 might be used rarely, but its availability would open new possibilities in the world of captioning. And no tradeoffs are required to gain this benefit; the first half of Line 21, Field 2, is already preserved for captioning, and the second half of Field 2 is virtually unused. Since Field 2 is currently worthless, and the EIA/CEG proposal gives it purpose, this proposal is a winner all the way around and deserves the support of the Commission.**

**Respectfully submitted,**

A handwritten signature in black ink, appearing to read "Jeffrey M. Hutchins". The signature is fluid and cursive, with a long horizontal stroke at the end.

**Jeffrey M. Hutchins  
Vice President & General Manager  
CaptionAmerica  
312 Blvd. of the Allies  
Pittsburgh, PA 15222  
(412) 261-1458**

**CERTIFICATE OF SERVICE**

**I, Jeffrey M. Hutchins, hereby certify that I have this day served a copy of CaptionAmerica's Comments in Support of the Request for Amendment, by first-class mail, postage prepaid to:**

**George A. Hanover  
Staff Vice President, Engineering  
Consumer Electronics Group  
Electronic Industries Association  
2001 Pennsylvania Avenue, NW  
Washington, DC 20006**

**Dated at Pittsburgh, Pennsylvania, this 23rd day of September, 1992.**

  
**Jeffrey M. Hutchins**